

IN THE UNITED STATES DISTRICT COURT  
FOR THE  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

FILED

2008 SEP 19 A 8:48

CLERK US DISTRICT COURT  
ALEXANDRIA, VIRGINIA

UNITED STATES OF AMERICA )  
 )  
 V. ) 1:08CR164  
 )  
 EUGENE JAY DURANTE MEDLEY )  
 Defendant. )

SENTENCING MEMORANDUM

COMES NOW the Defendant, by and through his attorney, Bobby B. Stafford and offers the following with respect to the sentencing of Eugene J. D. Medley:

The Defendant pled guilty in Count One to Conspiracy to distribute, Count Three, Possession of a firearm in furtherance of a drug trafficking crime and a criminal information of possession of an unregistered firearm, a Class C Felony. With respect to the latter, the Defendant waived jurisdiction of venue of this Court to have all of these matters heard together. The Probation Report seems to be complete with respect to relevant matters of Mr. Medley's life and his involvement in these offenses.

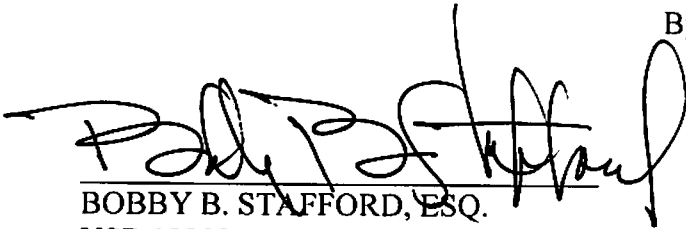
Mr. Medley comes to the Court accepting complete responsibility of his involvement in these offenses when he spoke to the Government representatives investigating the various offenses; he was truthful and forthright. He was interviewed thoroughly and even admitted to the criminal conduct in the information with respect to the sawed off shotgun, in which he could have avoided the acceptance of responsibility. We believe that this act alone should garner more benefit from the Court due to him being forthright.

Gleaning the Pre-Sentence report there seems to be a consistent lifestyle on the part of Mr. Medley to live an independent life and has accepted opportunities to better himself by engaging in a history of self-employment and training under an apprentice program to become a skilled electrician. We submit that Mr. Medley's failure (it is believed) was fostered by being exposed to drug abuse during his early age, ultimately contributing to the lifestyle which made him use drugs as support and abuse.

FINALLY, we ask the Court to grant as much leniency as the Court may dispense in terms of periods of incarceration in order for Mr. Medley to be rehabilitated and allowed an opportunity to return to society. He is a very promising young man and in terms of his Pre-Sentence Report, there appears great opportunity for him to take advantage based upon his background.

EUGENE JAY DURANTE MEDLEY

By Counsel

A handwritten signature in black ink, appearing to read "Bobby B. Stafford", is written over a horizontal line.

BOBBY B. STAFFORD, ESQ.  
VSB 12309

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CERTIFICATE OF SERVICE

I CERTIFY that on the 18th day of September, 2008, a true copy of the above Memorandum of Sentencing was mailed and faxed to Daniel J. Grooms AUSA, 2100 Jamieson Avenue, Alexandria, VA 22314, and fax no. 703 299-3982 and Kelly M. Bunce, U. S. Probation Officer, 401 Courthouse Square, Alexandria, VA 22314.

  
BOBBY B. STAFFORD